

**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**

Andrew J. Heck, Esq. (AH9361)

200 Campus Drive, 4<sup>th</sup> Floor

Florham Park, New Jersey 07932-0668

Tel: (973) 624-0800

Fax: (973) 624-0808

(e) [Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

*Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**NEWARK**

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JERRY COPPEDGE, JR.,

Plaintiff,

v.

KENDRICK D. SMITH, SNS TRUCKING CORP.,:

JOHN DOES 1-10 (FICTITIOUS PERSONS),:

ABC CORPS. 1-10 (FICTITIOUS ENTITIES),:

Defendants.:

: Civil Action No.

: Hon. \_\_\_\_\_

:

:

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:

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**NOTICE OF REMOVAL OF A  
CIVIL ACTION**

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TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT  
OF NEW JERSEY:

**PLEASE TAKE NOTICE**, that pursuant to 28 U.S.C. § 1446(a), Defendants, Kendrick D. Smith and SNS Trucking Corp. (hereinafter, “Defendants”), by and through the undersigned attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, on this date have filed this Notice of Removal of a Civil Action from the Superior Court of New Jersey, Law Division, Bergen County, Docket No. BER-L-1352-22, to the United States District Court for the District of New Jersey, together with all process, pleadings, and Orders, as required by 28 U.S.C. § 1446(a), copies of which are attached hereto and made part hereof, respectfully shows:

1. Plaintiff, Jerry Coppedge, Jr. (hereinafter “Plaintiff”) filed a Complaint on March 8, 2022, (the “Complaint”), commencing a personal injury action in the Superior Court of New Jersey, Law Division, Bergen County, Docket No. BER-L-1352-22, entitled Jerry Coppedge, Jr. v. Kendrick D. Smith, SNS Trucking Corp., John Does 1-10 (fictitious persons, and ABC Corps. 1-10 (fictitious entities) (the “Action”). A true and correct copy of Plaintiff’s Complaint is annexed hereto as **Exhibit A**.

2. The Complaint names only Defendants, Kendrick D. Smith and SNS Trucking Corp (hereinafter “Defendants”), in addition to fictitious parties. See Ex. A.

3. The Complaint alleges that this action arises out of a motor vehicle accident between Plaintiff and a truck owned by SNS Trucking Corp. that was operated by Kendrick D. Smith on or about September 24, 2021, in Fort Lee, New Jersey. See Ex. A.

4. The Complaint alleges that Plaintiff is a citizen of the State of Delaware, residing in Kent County. See Ex. A.

5. The Complaint alleges that Defendant SNS Trucking Corp. is a New York corporation with a principal place of business in Nassau County. See Ex. A.

6. The Complaint alleges that Kendrick D. Smith is a resident of the State of Georgia. See Ex. A.

7. For purposes of diversity jurisdiction, a corporate party is a citizen of both its state of incorporation and the state in which its principal place of business is located. Hertz Corp. v. Friend, 559 U.S. 77 (2010).

8. Pursuant to 28 U.S.C. §1446(b), a Notice of Removal “shall be filed within thirty days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based.”

9. Defendant Kendrick D. Smith was served with the Summons and Complaint in this matter on March 19, 2022. A true and correct copy of the Proof of Service on Kendrick D. Smith is attached hereto as **Exhibit B**.

10. Defendant SNS Trucking Corp. was served with the Summons and Complaint in this matter on March 28, 2022. A true and correct copy of the Proof of Service on SNS Trucking Corp. is attached hereto as **Exhibit C**.

11. Pursuant to 28 U.S.C. § 1446(b)(2)(c), “if defendants are served at different times, and a later-served defendant files a notice of removal, any earlier-served defendant may consent to the removal even though that earlier-served defendant did not previously initiate or consent to removal.”

12. All named Defendants consent to removal.

13. Accordingly, this Notice of Removal is timely filed.

14. Although Plaintiff’s Complaint fails to set forth a specified amount in controversy, Plaintiff’s Complaint alleges serious and permanent personal injuries. See Ex. A.

15. The undersigned met and conferred with Plaintiff’s counsel, who did not consent to limit Plaintiff’s claim for damages to an amount less than \$75,000.00. A true and correct copy of Plaintiff’s counsel’s email correspondence is attached hereto as **Exhibit D**.

16. Accordingly, Defendants respectfully submit that the amount in controversy in this matter is reasonably believed to be in excess of \$75,000.

17. This action is one in which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332(a) in that the matter in controversy is between citizens of different states and involves alleged damages in excess of \$75,000.

18. Defendants have also filed copies of this Notice with the Clerk of the Superior Court of New Jersey, Law Division, Bergen County, to perfect the removal of this action to the United States District Court pursuant to 28 U.S.C. § 1441 and § 1446(b). A true and exact copy of the Notice of Filing, without exhibits, filed with the Superior Court of New Jersey is annexed hereto as **Exhibit E**.

**WHEREFORE**, Defendants Kendrick D. Smith and SNS Trucking Corp., pray that given that the statutory requirements having been met, that the above-captioned action now pending in Superior Court of New Jersey, Law Division, Bergen County, be removed therefrom to this Court.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: April 26, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on behalf of Defendants SNS Trucking Corp. and Kendrick D. Smith, I caused the within Notice of Removal to be filed with the United States District Court on this date.

Clerk, United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

I further certify that a copy was sent via Electronic Filing to:

Clerk,  
New Jersey Superior Court  
Bergen County Courthouse  
10 Main Street  
Hackensack, NJ 07601

V. Ava Murray, Esq.  
Murray Law Group, LP  
1930 E. Marlton Pike  
Suite Q4A  
Cherry Hill, New Jersey 08002  
Attorney(s) for Plaintiff

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: April 26, 2022

# **EXHIBIT A**

**Murray Law Group, LP**

V. Ava Murray, Esq. - 260052019  
1930 E. Marlton Pike  
Suite Q4A  
Cherry Hill, NJ 08002  
609-605-2955  
Attorneys for Plaintiff

JERRY COPPEDGE, JR.  Plaintiff,  v.  KENDRICK D. SMITH, SNS TRUCKING CORP, JOHN DOES 1-10 (fictitious persons), ABC CORPS 1-10 (fictitious entities);  Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – BERGEN COUNTY DOCKET NO.: BER-L-  <i>CIVIL ACTION</i>  COMPLAINT, JURY DEMAND, CERTIFICATIONS, & DEMAND FOR DISCOVERY
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Plaintiffs, JERRY COPPEDGE, JR., by and through their attorneys Murray Law Group, LP, complaining of the Defendants, deposes and says:

**PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff, JERRY COPPEDGE, JR., is an adult individual who, at all times material hereto, resided in the County of Kent and State of Delaware.
2. Defendant, KENDRICK D. SMITH, is an adult individual who, at all times material hereto, resided in the State of Georgia.
3. Defendant, SNS TRUCKING CORP is a commercial entity that resides in the County of Nassau and State of New York.
4. Defendants, JOHN DOES 1-10 and ABC CORPS 1-10, were fictitious individuals and business entities, whose identities are unknown, that owned, operated, leased, managed,

maintained, controlled, possessed, and/or rented the aforesaid Defendants' vehicle, or are otherwise responsible for the accident and the injuries sustained by the plaintiff. Plaintiff will amend this Complaint at such time as the identity(s) of these fictitious defendants become known throughout the course of continuing investigation and discovery.

5. This Court has jurisdiction over the Defendants because, at all times relevant to this Complaint, they were residents and/or conducted business within the State of New Jersey, and/or they are licensed driver(s) and maintain a registered vehicle within the State of New Jersey.
6. Venue for this action properly lies in Bergen County, pursuant to R. 4:3 2(a), because this action is laid in the County in which the cause of action arose.

#### **FIRST COUNT**

7. Plaintiff repeats and re-alleges each and every allegation of the previous sections/counts as if fully set forth herein at length.
8. On or about September 24, 2021, Plaintiff was operating a motor vehicle in the Township of Fort Lee, County of Bergen, and State of New Jersey.
9. On that date, Defendant, KENDRICK D. SMITH, was the operator of a certain motor vehicle owned by Defendants, SNS TRUCKING CORP, which motor vehicle was being operated as a permissive user of the owner and/or as the agent, servant, and/or employee of the owner and which motor vehicle was also traveling in the Township of Fort Lee, County of Bergen, and State of New Jersey.
10. Defendants, KENDRICK D. SMITH and SNS TRUCKING CORP did so negligently and carelessly own, operate, and/or maintain the aforesaid motor vehicle causing Defendants' vehicle to cause a collision involving multiple motor vehicles, one of which was Plaintiff's



motor vehicle.

11. As a direct and proximate result of the negligence of the Defendants, as aforesaid, Plaintiff was caused to sustain, and did sustain, serious and permanent personal injuries requiring the care and treatment of physicians and medication, and has been, and will in the future continue to be, hampered in his daily routine.

**WHEREFORE**, Plaintiff demands judgment against Defendants, KENDRICK D. SMITH and SNS TRUCKING CORP, jointly, severally or in the alternative for compensatory damages, interest, costs, and such other relief as this court deems equitable and just under the circumstances.

**SECOND COUNT**

12. Plaintiff repeats and re-alleges each and every allegation of the previous sections/counts as if fully set forth herein at length.

13. At the aforementioned time and place, the Defendants, JOHN DOES 1-10 and ABC Corps 1-10, negligently and carelessly entrusted their vehicle and/or premises to the named defendants, or otherwise negligently and carelessly contributed to the happening of this accident and the injuries sustained by Plaintiff.

14. As a direct and proximate result of the aforesaid negligence and carelessness of the Defendants, JOHN DOES 1-10 and ABC Corps 1-10, Plaintiff was damaged as previously set forth herein at length.

**WHEREFORE**, Plaintiff demands judgment against the defendants, JOHN DOES 1-10 and ABC Corps 1-10, jointly, severally, and alternatively, for damages, interest and cost of suit.

**MURRAY LAW GROUP, LP**

*/s/ V. Ava Murray*

V. Ava Murray, Esq.

Date: March 8, 2022

**JURY DEMAND**

Plaintiff demands a trial by jury of the within issues.

**NOTICE OF DESIGNATION OF TRIAL COUNSEL**

Plaintiff hereby designates V. Ava Murray, Esquire as Trial Counsel.

**CERTIFICATION PURSUANT TO R.4:5-1**

I certify that, to the best of my knowledge, the matter in controversy is not the subject matter of another action pending in any or any pending arbitration proceeding and no other action or arbitration proceeding is contemplated. At the present time, I do not know the names of any other parties who should be joined in this action.

**DEMAND FOR INSURANCE INFORMATION**

**PLEASE TAKE NOTICE** that pursuant to R. 4:10-2(b), Plaintiffs hereby demands production of a copy of all insurance agreements under which the defendants may be covered to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**DEMAND FOR PRODUCTION OF DOCUMENTS**

**PLEASE TAKE NOTICE** that pursuant to R.4:18-1, plaintiffs demand the production for purposes of inspection and copying at Murray Law Group, LP, 1930 E. Marlton Pike, Suite Q4A, Cherry Hill, NJ 08003, within 45 days after service of the within pleadings, of the following items pertaining to the allegations of this Complaint:

1. Any written statements which you, or your counsel, have in your possession, custody, or control in regard to this incident/accident.
2. Copies of any photographs, videotapes or other reproduction which you have in your possession, custody, or control which relate, in any manner, to the incident, to the injuries which plaintiff(s) claim to have been sustained as a result of this incident/accident, or to property damage caused by this incident/accident.
3. A copy of all medical records regarding any treatment or consultation sought, or received, by plaintiff(s) as a result of this incident/accident.
4. Any documents which you claim (a) supports the separate defenses set forth in your responsive pleading to plaintiff's complaint and your answers to interrogatories or (b) rebuts the allegations set forth in plaintiff(s) complaint or his/her answers to interrogatories.
5. All documentation regarding any compensation or reimbursement which you claim plaintiff received, or requested, as a result of this accident/incident.
6. A copy of, or a description by category or location of, all documents, dates of compilations, and tangible things in the possession, custody or control of defendants that relate to the disputed facts alleged with particularity in the pleadings.
7. A copy of all written reports prepared and signed by any person who may be used at trial under Evidence Rules 702, 703 or 705.

8. Copies of all notes, records, and reports of all doctors, physiatrists, nurses, psychiatrists, psychologists, neuropsychologist, neurologist, or any other healthcare professional retained by defendants for purposes of performing an examination and evaluation on the plaintiff.
9. Any written statement which you or your counsel have in your possession regarding any of the facts set forth in any party's answer to interrogatories, initial pleading, or responsive pleading, or with respect to any damages.
10. All insurance agreements or policies under which any person or firm carrying an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy judgment pursuant to R. 4:10-2(b). Terms of the policy are also requested.
11. Copies of all documents, not otherwise set forth, which were sent to or received from the plaintiff(s).
12. Copies of all statements and other documents obtained by any person or entity which concern or relate to plaintiff(s) complaint or any defendant(s) answers, separate defense(s), or counterclaim.
13. All documents which were filled out by or on behalf of plaintiff at the request of defendant's expert, or his/her agents or employees.
14. All documents considered by defendant's expert in preparing his/her report or conducting an examination or evaluation.
15. All diagrams, charts models, drawings, maps or other exhibits prepared by or on behalf of any party related to the subject matter of the complaint.

16. All police reports concerning any automobile accident involving any defendant that occurred within one year (before and after) of the date of the incident(s) complained of in plaintiff's complaint.
17. All books, treatises, commentaries, reports, statutes, codes, ordinances, rules, regulations, standards or other documents referred to and utilized by or relied upon by any expert witness whom the party responding to this document demand intends to call at trial.
18. All treatises, textbooks, articles, papers, writings, commentaries, and documents which you, your counsel, and/or your experts intend to rely upon, utilize and/or offer into substantive evidence or to substantiate any opinions, testimony or conclusions asserted by your experts.
19. All treatises, textbooks, articles, papers, writings, commentaries, and documents which you, your counsel, and/or your experts intend to rely upon to rebut, examine and/or cross-examine any witness, including expert witnesses, in this matter, including but not limited to the exact page upon which you, your attorney and/or your expert intend to rely, as well as the exact title, name, author, publisher, date of publication, and edition.
20. All transcripts of sworn testimony (including but not limited to depositions and testimony before any tribunal and/or court) given by an expert who may testify in this matter.
21. All documents concerning all claims for bodily injury to plaintiff that are in the possession, custody, or control of defendant or defendant's attorney.
22. All documents you have concerning any claim for bodily injuries made by plaintiff(s) other than the incident concerning this lawsuit.
23. Copies of all statements that will be used at trial, or will be used to cross-examine or impeach any witness.

24. All surveillance videos, reports, notes, memoranda, or other documents respecting plaintiff.

25. All hospital records and reports of doctors and medical records of any doctors who treated defendant for injuries sustained in the incident which forms the basis of this suit.

**DEMAND FOR ANSWERS TO FORM C AND C1 UNIFORM INTERROGATORIES  
AND SUPPLEMENTAL INTERROGATORIES**

Please take notice that pursuant to R.4:17-1(b)(ii) plaintiff demand certified answers to Form C. and C(1) of the Uniform Interrogatories set forth in Appendix to the Rules Governing Civil Practice and the following supplemental interrogatories:

1. Specify where you were coming from and where you intended to go at the time of the accident (give the name and exact street address of each location).
2. State whether you consumed any drugs, medication or alcoholic beverages in the 24 hours before the accident, specifying the kind, amount and place where consumed.
3. Describe your path of travel, including speed, lane changes, during the last 500 feet of travel immediately before the point of impact.
4. State what you did, if anything, to avoid the accident.
5. State whether your license or driving privileges have been suspended/revoked within the last five years and indicate the reason why.
6. If this defendant(s) contends in any way that the injuries claimed by plaintiff(s) to have been caused by this incident were in fact not caused or in any way related to this incident, state fully and in detail each and every fact upon which defendant will rely in support of said contention. Annex hereto copies of all medical records or other documents upon which defendant will rely in support of said contention.

7. If defendant(s) contend that plaintiff(s) sustained physical injuries at any time prior or subsequent to the subject accident, please state:
  - a. The date of all said injuries; and
  - b. The nature of any said injuries.
8. State whether or not you owned, possessed or utilized a cellular phone, car phone, pager, or Personal Digital Assistant (PDA) on the date of the accident. If so, please state the name and address of the telephone company billing you use for each said phone/pager/PDA on the date of the accident; the specific types of phone/pager/PDA and corresponding phone numbers; and attach hereto a copy of all billing statements for all calls made or received on each phone/pager/PDA during the month before, during and after the subject accident.
9. State whether or not you wear, need to wear and/or are required to wear any type of corrective lenses at the time of the accident and if so, state what type of corrective lenses you wear, whether you are nearsighted or farsighted, what level of strength your eyesight was measured as of the day of the accident, and the names and addresses of all optometrists, ophthalmologists, eye surgeries, and other physicians seen over the past 5 years with regard to the care of your eyes.

**MURRAY LAW GROUP, LP**

*/s/ V. Ava Murray*

V. Ava Murray, Esq.

Date: March 8, 2022



# **EXHIBIT B**



## SUMMONS

Attorney(s) MURRAY LAW GROUP, LP

Office Address 1930 W. MARLTON PIKE, Q4A

Town, State, Zip Code CHERRY HILL, NJ 08002

Telephone Number (609) 605-2955

Attorney(s) for Plaintiff \_\_\_\_\_

JERRY COPPEDGE, JR.  
Plaintiff(s)

Vs.

KENDRICK D. SMITH, et al

Defendant(s)

## Superior Court of New Jersey

BERGEN COUNTY

LAW DIVISION

Docket No: BER-L-1352-22

## CIVIL ACTION SUMMONS

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

/S/Michelle M. Smith

Clerk of the Superior Court

DATED: 03/08/2022

Name of Defendant to Be Served: KENDRICK D. SMITH

Address of Defendant to Be Served: 308 WALDEN WALK DRIVE, STONE MOUNTAIN, GA 30088  
3037 KENNICOTT LN. DECATUR, GA 30034

# **EXHIBIT C**

JERRY COPPEDGE, JR. Plaintiff  
vs.  
KENDRICK D. SMITH et al Defendant

Superior Court of New Jersey  
Law Division  
Bergen County  
Docket Number: BER-L-1352-22

Person to be served (Name & Address):  
SNS TRUCKING CORP.  
193 JUANITA AVE.  
FREEPORT, NY 11520

### AFFIDAVIT OF NON-SERVICE

(For Use by Private Service)

Attorney:  
MURRAY LAW GROUP LP  
1930 Rte 70 W  
Ste Q-4A  
Cherry Hill, NJ 08002

Papers Served: SUMMONS AND COMPLAINT, CIS

#### Service Data:

Served Successfully \_\_\_\_\_ Not Served X Date: 3/19/2022 Time: 10:15 am Attempts: \_\_\_\_\_

\_\_\_\_\_ Delivered a copy to him / her personally Name of Person Served and relationship / title: \_\_\_\_\_  
\_\_\_\_\_ Left a copy with a competent household member over 14 years of age residing therein \_\_\_\_\_  
\_\_\_\_\_ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc. \_\_\_\_\_

#### Description of Person Accepting Service:

Sex: \_\_\_\_\_ Age: \_\_\_\_\_ Height: \_\_\_\_\_ Weight: \_\_\_\_\_ Skin Color: \_\_\_\_\_ Hair Color: \_\_\_\_\_

#### Unserved:

- ( ) Defendant is unknown at the address furnished by the attorney  
( ) All reasonable inquiries suggest defendant moved to an undetermined address  
( ) No such street in municipality  
( ) No response on: \_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_  
\_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_

(X) Other: SEE COMMENTS

#### Comments or Remarks:

NO ANSWER ON 6 ATTEMPTS AT THIS RESIDENCE. NO CONFIRMATION SNS TRUCKING IS LOCATED HERE. NEIGHBORS DID NOT RECOGNIZE THIS COMPANY. ATTEMPTS: 3/12 12:30PM; 3/15 8:24PM; 3/17 7:06AM; 3/17 7:40PM; 3/18 5:00PM; 3/19 10:15AM

#### Server Data:

23rd  
Subscribed and Sworn to before me on the 22nd day of March, 2022 by the affiant who is personally known to me.

NOTARY PUBLIC

I, THOMAS AZULGA, was at the time of service a competent adult not having a direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server

3/23/22  
Date

ALEXANDER JAMES  
Notary Public - State of New York  
No. 01JA6029931  
Qualified in Nassau County  
My Comm. Expires Aug. 30, 2025

COURT HOUSE LEGAL SERVICES, INC.  
112 Haddontowne Ct, Ste. 304  
Cherry Hill, NJ 08034  
(856) 428-4700  
Our Job Serial Number: CHL-2022002233  
Ref: COPPEDGE/SMITH

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>X </p>	
1. Article Addressed to:		B. Received by (Printed Name)	C. Date of Delivery
SNS Trucking Corp 193 Juanita Ave Freeport, NY 11520		SHeldon	3-28-22
2. Article Number (Transfer from service label)		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No	
9590 9402 7027 1225 0039 48			
008 1830 0000 5089 4940		3. Service Type	
PS Form 3811, July 2020 PSN 7530-02-000-9053		<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
		<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	

Domestic Return Receipt



1 OF 1 RECORD(S)

FOR INFORMATIONAL PURPOSES ONLY

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Report Created: March 24, 2022 - Thursday 5:02 PM

## Experian Business Data

This data is for informational purposes only.

### Business Information

Experian Company Number: 985633174  
Company Name: SNS TRUCKING CORP  
Address: 193 JUANITA AVE  
FREEPORT, NY 11520-4141  
NASSAU COUNTY  
Phone: 516-642-7168  
BusinessType: CORPORATION  
Business Description: Trucking, Exc Local  
SIC Code: 4213  
Profit Range: 0  
Net Worth: 0  
Active Customer Count: 0  
Officers: MR SHELDON SAHADEO, OWNER  
Date First Seen: 06/2014  
Date Last Seen: 12/07/2021  
Last Updated Date: 12/07/2021  
File Establish Date: 06/2014

### Demographics 5600

SIC Codes: 4213: Trucking, Exc Local  
Years In Business: 0  
Business Type: CORPORATION

### Demographics 5610

Officer Title: OWNER  
Officer Name: SAHADEO, SHELDON  
Original Officer Name: SAHADEO, SHELDON

## Experian

This data is for informational purposes only.

### Summary

Company Name: SNS TRUCKING CORP

**Address:** 193 JUANITA AVE  
FREEPORT, NY 11520-4141  
NASSAU COUNTY  
**Experian File Number:** 985633174  
**File Established:** 06/13/2014

#### Business Description





**Industry:** TRANSPORTATION/UTILITY  
**SIC:** 4213 (TRUCKING, EXCEPT LOCAL)  
**Years in Business (ACTUAL):** 6 TO 10 YEARS  
**Business Type:** CORPORATION  
**Owner Type:** PRIVATE  
**Location:** HEADQUARTERS

### Dept. Of Transportation SAFER Crash Carrier Record

This data is for informational purposes only.

**Company Name:** SNS TRUCKING CORP  
**Id Value:** 4259845 4259848  
**Address:** 193 JUANITA AVE  
FREEPORT, NY 11520-4141

#### Key

-  High Risk Indicator. These symbols may prompt you to investigate further
-  Moderate Risk Indicator. These symbols may prompt you to investigate further
-  General Information Indicator. These symbols inform you that additional information is provided
-  The most recent telephone listing as reported by the EDA source

**Important:** The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State.

Your DPPA Permissible Use: I have no permissible use

Your GLBA Permissible Use: I have no permissible use

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V. Ava Murray, Esq.  
Attorney ID# 260052019  
**MURRAY LAW GROUP, LP**  
1930 E. Marlton Pike, Suite Q-4A  
Cherry Hill, NJ 08052  
(609) 605-2955  
*Attorneys for Plaintiff*

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JERRY COPPEDGE, JR,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: BERGEN COUNTY
PLAINTIFF	:	
	:	Civil Action
	:	
	:	DOCKET NO.: BER-L-001352-22
	:	
	:	PROOF OF SERVICE BY
v.	:	CERTIFIED MAIL PURSUANT TO
	:	<u>R. 4:4-3</u>
KENDRICK D. SMITH,	:	
SNS TRUCKING CORP.,	:	
JOHN DOES 1-10 (fictitious persons)	:	
ABC CORPS 1-10 (fictitious entities)	:	
DEFENDANTS	:	
	:	

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I, V. Ava Murray, Esq., of full age hereby certify as follows:

1. I am an attorney-at-law licensed to practice in the State of New Jersey. I am thoroughly familiar with the facts set forth herein.
2. This Certification is being submitted in support of the Proof of Service pursuant to R. 4:4-3.
3. On March 8, 2022, the undersigned filed an auto negligence complaint.
4. The undersigned retained Court House Legal Services, Inc to effectuate the service of the Summons and Complaint.
5. In its Affidavit of Non-Service, Court House Legal Services, Inc. indicates that they made six (6) attempts to serve the Summons and Complaint but were unsuccessful. *See Exhibit "A."*
6. On March 25, 2022, the undersigned mailed the Summons and Complaint to SNS Trucking Corp., at 193 Juanita Ave, Freeport, NY 11520 via certified mail return receipt requested.
7. On March 31, 2022, the undersigned received the green card back, indicating that on March 28, 2022, "SHELDON" received and signed for the package containing the Summons and Complaint. *See Exhibit "B," See also Exhibit "C," the*

*LexisNexis report confirming that Sheldon Sahadeo is the owner of SNS Trucking Corp.*

8. Based on the above-mentioned, the Summons and Complaint was received by Defendant SNS Trucking Corp on March 28, 2022.
9. **I swear or affirm under penalty of perjury that the contents of this document are true and correct to the best of my knowledge and belief.**

Respectfully Submitted,

/s/ V. Ava Murray

By: \_\_\_\_\_  
V. Ava Murray, Esq.  
Attorney for Defendants

Dated: April 4, 2022.



# **EXHIBIT D**

**Coyne, Kate**

---

**From:** V. Ava Murray, Esq. <vavamurray@murraylwgrp.com>  
**Sent:** Monday, April 11, 2022 9:59 AM  
**To:** Heck, Andrew J.  
**Cc:** Zeno, Charlene; Coyne, Kate  
**Subject:** Re: Coppedge v. SNS Trucking Corp. and Kendrick Smith, et al.; WEMED File No. 12741.TBD

**[EXTERNAL EMAIL]**

Good morning Andrew,

I hope you had a great weekend. After speaking with my client, he has opted not to cap damages at \$75k. Lastly, I will send you a demand package sometime this week or early next week.

Regards,

V. Ava Murray, Esq.

---

**From:** V. Ava Murray, Esq. <vavamurray@murraylwgrp.com>  
**Date:** Wednesday, April 6, 2022 at 1:54 PM  
**To:** Heck, Andrew J. <Andrew.Heck@wilsonelser.com>  
**Cc:** Zeno, Charlene <Charlene.Zeno@wilsonelser.com>, Coyne, Kate <Kate.Coyne@wilsonelser.com>  
**Subject:** Re: Coppedge v. SNS Trucking Corp. and Kendrick Smith, et al.; WEMED File No. 12741.TBD

Andrew,

It was a pleasure speaking with you as well. Your recitation of our conversation is correct. I will discuss with my client and get back to you as soon as possible.

Regards,

V. Ava Murray, Esq.

---

**From:** Heck, Andrew J. <Andrew.Heck@wilsonelser.com>  
**Date:** Wednesday, April 6, 2022 at 10:59 AM  
**To:** vavamurray@murraylwgrp.com <vavamurray@murraylwgrp.com>  
**Cc:** Zeno, Charlene <Charlene.Zeno@wilsonelser.com>, Coyne, Kate <Kate.Coyne@wilsonelser.com>  
**Subject:** RE: Coppedge v. SNS Trucking Corp. and Kendrick Smith, et al.; WEMED File No. 12741.TBD

Ava –

Pleasure speaking with you this morning. As we discussed, my office has been retained with respect to the above matter on behalf of the defense.

# **EXHIBIT E**

**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**

Andrew J. Heck, Esq. (AH9361)

200 Campus Drive, 4<sup>th</sup> Floor

Florham Park, New Jersey 07932-0668

Tel: (973) 624-0800

Fax: (973) 624-0808

(e) [Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

*Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.*

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JERRY COPPEDGE, JR.,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION:
Plaintiff,	:	BERGEN COUNTY
	:	
v.	:	DOCKET NO.: BER-L-1352-22
	:	
KENDRICK D. SMITH, SNS TRUCKING CORP.,	:	<b>VIA ECOURT FILING</b>
JOHN DOES 1-10 (FICTITIOUS PERSONS),	:	
ABC CORPS. 1-10 (FICTIOUS ENTITIES),	:	CIVIL ACTION
	:	
Defendants.	:	

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**NOTICE OF FILING OF REMOVAL TO UNITED STATES DISTRICT COURT**

**PLEASE TAKE NOTICE**, that pursuant to 28 U.S.C. § 1446(a), Defendants, Kendrick D. Smith and SNS Trucking Corp. (hereinafter, “Defendants”), by and through the undersigned attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, on this date have filed a Notice of Removal of a Civil Action from the Superior Court of New Jersey, Law Division, Bergen County, Docket No. BER-L-1352-22, to the United States District Court for the District of New Jersey, together with all process, pleadings, and Orders, as required by 28 U.S.C. § 1446(a), copies of which are attached hereto and made part hereof.

**PLEASE TAKE FURTHER NOTICE**, that Defendant USF hereby files this Notice and Petition with the Bergen County Clerk of the Superior Court of New Jersey, Law Division, in accordance with 28 U.S.C. § 1446.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: April 26, 2022



**CERTIFICATE OF SERVICE**

I hereby certify that on behalf of Defendants Kendrick D. Smith and SNS Trucking Corp., I caused the within Notice of Filing of Removal to be served via Electronic Filing, upon:

Clerk,  
Bergen County Courthouse  
10 Main Street  
Hackensack, NJ 07601

V. Ava Murray, Esq.  
Murray Law Group, LP  
1930 E. Marlton Pike  
Suite Q4A  
Cherry Hill, New Jersey 08002  
Attorney(s) for Plaintiff

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: April 26, 2022

# EXHIBIT A

**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**

Andrew J. Heck, Esq. (AH9361)

200 Campus Drive, 4<sup>th</sup> Floor

Florham Park, New Jersey 07932-0668

Tel: (973) 624-0800

Fax: (973) 624-0808

(e) [Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

*Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**NEWARK**

---

JERRY COPPEDGE, JR.,

Plaintiff,

v.

KENDRICK D. SMITH, SNS TRUCKING CORP.,:

JOHN DOES 1-10 (FICTITIOUS PERSONS),:

ABC CORPS. 1-10 (FICTITIOUS ENTITIES),:

Defendants.:

: Civil Action No.

: Hon. \_\_\_\_\_

**NOTICE OF REMOVAL OF A  
CIVIL ACTION**

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TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT  
OF NEW JERSEY:

**PLEASE TAKE NOTICE**, that pursuant to 28 U.S.C. § 1446(a), Defendants, Kendrick D. Smith and SNS Trucking Corp. (hereinafter, “Defendants”), by and through the undersigned attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, on this date have filed this Notice of Removal of a Civil Action from the Superior Court of New Jersey, Law Division, Bergen County, Docket No. BER-L-1352-22, to the United States District Court for the District of New Jersey, together with all process, pleadings, and Orders, as required by 28 U.S.C. § 1446(a), copies of which are attached hereto and made part hereof, respectfully shows:

1. Plaintiff, Jerry Coppedge, Jr. (hereinafter “Plaintiff”) filed a Complaint on March 8, 2022, (the “Complaint”), commencing a personal injury action in the Superior Court of New Jersey, Law Division, Bergen County, Docket No. BER-L-1352-22, entitled Jerry Coppedge, Jr. v. Kendrick D. Smith, SNS Trucking Corp., John Does 1-10 (fictitious persons, and ABC Corps. 1-10 (fictitious entities) (the “Action”). A true and correct copy of Plaintiff’s Complaint is annexed hereto as **Exhibit A**.

2. The Complaint names only Defendants, Kendrick D. Smith and SNS Trucking Corp (hereinafter “Defendants”), in addition to fictitious parties. See Ex. A.

3. The Complaint alleges that this action arises out of a motor vehicle accident between Plaintiff and a truck owned by SNS Trucking Corp. that was operated by Kendrick D. Smith on or about September 24, 2021, in Fort Lee, New Jersey. See Ex. A.

4. The Complaint alleges that Plaintiff is a citizen of the State of Delaware, residing in Kent County. See Ex. A.

5. The Complaint alleges that Defendant SNS Trucking Corp. is a New York corporation with a principal place of business in Nassau County. See Ex. A.

6. The Complaint alleges that Kendrick D. Smith is a resident of the State of Georgia. See Ex. A.

7. For purposes of diversity jurisdiction, a corporate party is a citizen of both its state of incorporation and the state in which its principal place of business is located. Hertz Corp. v. Friend, 559 U.S. 77 (2010).

8. Pursuant to 28 U.S.C. §1446(b), a Notice of Removal “shall be filed within thirty days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based.”

9. Defendant Kendrick D. Smith was served with the Summons and Complaint in this matter on March 19, 2022. A true and correct copy of the Proof of Service on Kendrick D. Smith is attached hereto as **Exhibit B**.

10. Defendant SNS Trucking Corp. was served with the Summons and Complaint in this matter on March 28, 2022. A true and correct copy of the Proof of Service on SNS Trucking Corp. is attached hereto as **Exhibit C**.

11. Pursuant to 28 U.S.C. § 1446(b)(2)(c), “if defendants are served at different times, and a later-served defendant files a notice of removal, any earlier-served defendant may consent to the removal even though that earlier-served defendant did not previously initiate or consent to removal.”

12. All named Defendants consent to removal.

13. Accordingly, this Notice of Removal is timely filed.

14. Although Plaintiff’s Complaint fails to set forth a specified amount in controversy, Plaintiff’s Complaint alleges serious and permanent personal injuries. See Ex. A.

15. The undersigned met and conferred with Plaintiff’s counsel, who did not consent to limit Plaintiff’s claim for damages to an amount less than \$75,000.00. A true and correct copy of Plaintiff’s counsel’s email correspondence is attached hereto as **Exhibit D**.

16. Accordingly, Defendants respectfully submit that the amount in controversy in this matter is reasonably believed to be in excess of \$75,000.

17. This action is one in which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332(a) in that the matter in controversy is between citizens of different states and involves alleged damages in excess of \$75,000.

18. Defendants have also filed copies of this Notice with the Clerk of the Superior Court of New Jersey, Law Division, Bergen County, to perfect the removal of this action to the United States District Court pursuant to 28 U.S.C. § 1441 and § 1446(b). A true and exact copy of the Notice of Filing, without exhibits, filed with the Superior Court of New Jersey is annexed hereto as **Exhibit E**.

**WHEREFORE**, Defendants Kendrick D. Smith and SNS Trucking Corp., pray that given that the statutory requirements having been met, that the above-captioned action now pending in Superior Court of New Jersey, Law Division, Bergen County, be removed therefrom to this Court.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: April 26, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on behalf of Defendants SNS Trucking Corp. and Kendrick D. Smith, I caused the within Notice of Removal to be filed with the United States District Court on this date.

Clerk, United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

I further certify that a copy was sent via Electronic Filing to:

Clerk,  
New Jersey Superior Court  
Bergen County Courthouse  
10 Main Street  
Hackensack, NJ 07601

V. Ava Murray, Esq.  
Murray Law Group, LP  
1930 E. Marlton Pike  
Suite Q4A  
Cherry Hill, New Jersey 08002  
Attorney(s) for Plaintiff

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
Attorneys for Defendants Kendrick D. Smith and SNS Trucking Corp.

By: /s/ Andrew J. Heck  
Andrew J. Heck. (AH9361)  
[Andrew.Heck@wilsonelser.com](mailto:Andrew.Heck@wilsonelser.com)

Dated: April 26, 2022